

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GHASSAN ALASAAD, NADIA
ALASAAD, SUHAIB ALLABABIDI, SIDD
BIKKANNAVAR, JÉRÉMIE
DUPIN, AARON GACH, ISMAIL ABDEL-
RASOUL aka ISMA'IL KUSHKUSH,
ZAINAB MERCHANT, MOHAMMED
AKRAM SHIBLY, MATTHEW WRIGHT,
and DIANE MAYE ZORRI,

Plaintiffs,

v.

KEVIN McALEENAN, Secretary of the U.S.
Department of Homeland Security, in his
official capacity; JOHN SANDERS, Acting
Commissioner of U.S. Customs and Border
Protection, in his official capacity; and
MATTHEW T. ALBENCE, Acting Director
of U.S. Immigration and Customs
Enforcement, in his official capacity,

Defendants.

Civil Action No. 17-cv-11730-DJC

Hon. Denise J. Casper

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, all Plaintiffs respectfully move the Court to enter summary judgment in their favor against all Defendants on their claims in their Amended Complaint, ECF No. 7. Plaintiffs file the following documents in support of the instant Motion: Plaintiffs' Memorandum in Support of Their Motion for Summary Judgment and Plaintiffs' Statement of Undisputed Material Facts in Support of Their Motion for Summary Judgment with accompanying 47 exhibits, including the declarations of all 11 Plaintiffs and the declaration of Plaintiffs' attorney Sophia Cope. Plaintiffs also file an Assented-To Motion to File Under Seal Records Covered by Protective Order.

Request for Oral Argument

Pursuant to Local Rule 7.1(d), Plaintiffs request oral argument. This Court has currently scheduled a hearing on July 18, 2019, to hold oral argument on the instant Motion. ECF No. 88.

Respectfully submitted:

Dated: April 30, 2019

Adam Schwartz *
Sophia Cope*
Saira Hussain*
ELECTRONIC FRONTIER
FOUNDATION
815 Eddy Street
San Francisco, CA 94109
(415) 436-9333 (phone)
(415) 436-9993 (fax)
adam@eff.org
sophia@eff.org
saira@eff.org

/s/Esha Bhandari
Esha Bhandari*
Hugh Handeyside*
Nathan Freed Wessler*
AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION
125 Broad Street,
18th Floor
New York, NY 10004
(212) 549-2500 (phone)
(212) 549-2583 (fax)
ebhandari@aclu.org
hhandeyside@aclu.org
nwessler@aclu.org

Jessie J. Rossman
BBO #670685
Matthew R. Segal
BBO #654489
AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION OF
MASSACHUSETTS
211 Congress Street
Boston, MA 02110
(617) 482-3170 (phone)
(617) 451-0009 (fax)
jrossman@aclum.org
msegal@aclum.org

**Admitted pro hac vice
Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I certify that on April 30, 2019, a copy of the foregoing was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Esha Bhandari

Esha Bhandari